REMARKS

The indicated allowability of claims 4-6, 11, 13, 14, 18 and 20 is noted with thanks. Applicant has rewritten claims 4 and 18 in independent form. Thus, it is believed claim 4 and claims 5, 6, 11, 13 and 14 which depend on claim 4, and claim 18 and claim 20 which depend on claim 18 are now in condition for allowance.

Non-elected claims 21-31 have been cancelled.

The rejection of claims 1-3 under 35 USC § 103(a) as being anticipated by Yuuki et al. (US Patent No. 5,776,254) in view of Moran et al. (US Patent No. 5,169,676) is in error. Claim 1 requires, in part, an "orienting element using a d.c. electrical potential for orienting precursor molecules in the direction of the electrical field induced by said d.c. electrical potential."

As admitted by the Examiner in cipher 5 of the action, the primary reference Yuuki et al. nowhere teaches the generation of an electric field for the orientation of deposition material. Moran et al. fails to supply this missing teaching. Moran et al. teaches a voltage applied to stage 37 at a particular setting to optimize crystallite size and growth rate (Fig. 2; Col. 7, Lines 45-55). Nowhere does Moran et al. teach or suggest generating an electric field to orient the deposition material or that applying a voltage to stage 37 would have an effect on the orientation of the deposition material. Thus, no combination of Yuuki et al. and Moran et al. would achieve claim 1, and claim 1 and claims 2-3 which depend on claim 1 cannot be said to be obvious from Yuuki et al. and Moran et al.

Moreover, the apparatus disclosed in Moran et al. is a conventional apparatus, in which a bias voltage is applied to the substrate, and ions such as argon are allowed to collide with the surface of the substrate, the purpose is to impure the film surface purity and step coverage, and

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improve the flatness of the film surface. (See the discussion of the prior art, in particular page 3, lines 16-22 of the instant application.)

However, in the present invention, a d.c. potential is applied to the substrate or the deposited film so as to control crystal orientation by using an electrostatic action or the action of an electrical current on the surface of the substrate or the deposited film.

Having dealt with all the objections raised by the Examiner, the Application is now believed to be in order for allowance. Early and favorable action is respectfully requested.

In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,

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CERTIFICATE OF MAILING

I certify that this correspondence is being deposited with the United States Postal Service as First Class mail in an envelope addressed to MAIL STOP AMENDMENT, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on OCTOBER 10, 2006 at Tucson, Arizona.

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